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www.ogeecheeriverkeeper.org
Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

May 26, 2023

Via E-Mail

Karen Saunds, Grant Specialist
Coastal Regional Commission of Georgia
ksaunds@crc.ga.gov

Re: Comments on DRIs # 3981 - Stubbs Tract 2 Warehouse Development

Dear Ms. Saunds:

Ogeechee Riverkeeper's ("ORK") mission is to protect, preserve, and improve the water quality of the Ogeechee River basin, including the Canoochee River and the coastal and tidal rivers of Liberty, Bryan, and Chatham Counties. ORK works with local communities to share and collect information on the ecological and cultural importance of rivers and streams throughout the Basin, and use that information to amplify the voices of those who speak for the watershed. One of ORK's primary roles is as watchdog on new land development projects throughout the watershed that could pose a significant threat to water quality.

ORK offers these comments on the warehouse development proposed for Stubbs Tract 1, owned by the J.P. & Elizabeth Stubbs Living Trust and to be developed by Silverman Land Holdings, LLC (the "applicants"). Overall, ORK recommends that the two Stubbs Tracts not be rezoned for the proposed warehouse developments. The recent boom of warehouse developments and the unclear need for all of this additional space calls the necessity of the project into question. Coupled with the loss of Areas of Significant Natural Resources, the need to replace the lost environmental services that these properties are currently providing, and the increased stormwater management demands from hundreds of acres of impervious surfaces, there are serious concerns about the proposed development. As such, ORK calls on future decision makers to seek more information about this development and to carefully consider the long term impacts before rezoning and permitting any development activities.

1. Weighing Uncertain Warehouse Needs against Natural Resources Impact

ORK is concerned about the rapid and sustained build-out of warehouses in the region. Combined, Stubbs Tracts 1 and 2 will add 3.2 million square feet of warehouse space and around 200 acres of new impervious surfaces. This

is in addition to the 5.1 million square feet of warehouse space already considered by the Coastal Regional Commission in just the last six months.¹ ORK urges the decision makers to take a big-picture view of the existing warehouse space.

Additionally, with such a rapid build-out of warehouse space, ORK is concerned that these spaces might never be used for their intended purposes. The incoming glut of warehouse space might result in an overbuild of the required need, leading to empty buildings and hundreds of acres of new and unused impervious surface potentially being left abandoned in the coming years and decades. ORK calls on the Coastal Regional Commission and any subsequent decision makers to take a hard look at the need for any newly proposed warehouse space. Without actual demand, the negative impacts these warehouses could far outweigh their benefit.

It is important to remember that these warehouse projects, including the two Stubbs Tracts, are not impacting vacant lands. These proposed projects are sited in Areas Requiring Special Attention (“ARSA”), Areas of Significant Natural Resources, and near waterways. Once these projects are constructed, these areas and the environmental services that they provide - stormwater management and filtration, wildlife habitat, and groundwater recharge, among others - will be lost and will need to be addressed through new or expanded infrastructure, artificial structures, or other forms of mitigation.

Likewise, nearby residential areas will also be negatively impacted by the industrial rezoning and the accompanying heavy vehicle traffic and activity. Stubbs Tract 1, in particular, borders many residential properties on the northern and eastern boundaries. The impact to these residents should also be considered in determining whether to rezone these properties.

Overall, ORK urges careful consideration of the actual needs for and benefits from these proposed warehouse spaces compared to the regional impacts that come from their construction. All decision makers should take a hard look at these and all future warehouse developments and compare their long term benefits to the long lasting effects of losing these quickly dwindling significant natural resources and the environmental services they provide.

2. Non-Jurisdiction Wetlands’ Benefits and Need for Jurisdictional Determination

Attention should be paid to all wetlands impacted by this proposed rezoning and development, including non-jurisdictional wetlands. While the non-jurisdictional wetlands do not receive the same protection under the Clean Water Act, the services they provide are still important. They help to slow down stormwaters, reducing erosion and sedimentation as well as strain on existing stormwater infrastructure. The slowed stormwaters are also better able to recharge groundwater in these wetlands. Additionally, by retaining excess water, wetlands help reduce the potential for flooding that would otherwise damage adjacent and downstream properties. Finally, wetlands also provide quickly dwindling habitat for the region's wildlife in a rapidly developing area. The jurisdictional status of these wetlands does not reduce their important role.

Additionally, the wetlands identified as “non-jurisdictional” in the conceptual plan still need to be assessed by the U.S. Army Corps of Engineers (“USACE”). Nowhere in the applicants’ submitted documents does it show that the USACE has made the required determinations that these wetlands are, in fact, not jurisdictional. ORK asks that the

¹ These projects include DRI# 3966, # 3949, # 3945, # 3930, # 3911, and # 3885.

applicants explain how these wetlands were deemed to be non-jurisdictional. Additionally, ORK asks that subsequent decision makers ensure that these wetlands have been properly assessed by the USACE prior to permitting any rezoning or other development actions.

3. Stormwater Considerations from Development

These warehouse developments will increase stormwater-related pressures on the surrounding areas. Beyond the environmental services lost to wetland fills, the estimated 140 acres of new impervious surface proposed for the Stubbs Tract 1 will contribute to additional issues including erosion, sedimentation, and pollution control as well as reduce groundwater recharge. Without more information about the planned stormwater management, ORK urges all subsequent decision makers to ensure that stormwater will properly and effectively managed and will not contribute to land, groundwater, or water quality degradation.

4. Groundwater and Wastewater Management

The DRI announcement notes that the development plans to meet both its water supply and wastewater disposal through future Bryan County service lines. ORK supports this approach, especially for wastewater disposal. Centralized water supply and wastewater disposal ensures that waterways and the region's natural resources are better protected.

However, ORK calls on decision makers to delay development on this site until these service lines are actually installed. Without these lines, water and wastewater management will not be properly addressed at the site. ORK also strongly recommends against temporary efforts to deal with these issues, such as temporary groundwater withdrawals or a temporary septic or land application system. Likewise, in the event that the proposed water and wastewater service lines are not extended to these properties, ORK urges against the installation of onsite septic systems.

Thank you in advance for your time and consideration. If you have any questions regarding this letter, please contact ben@ogeecheeriverkeeper.org or 866-942-6222 x9.

Ben Kirsch
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